

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re Terrorist Attacks on September 11, 2001

03 MDL 1570 (GBD)(FM)
ECF Case

This document relates to:

Burnett, Sr., et al. v. Al Baraka Inv. & Dev. Corp., et al., No. 03 Civ. 9849
Federal Insurance Co., et al. v. Al Qaeda, et al., No. 03 Civ. 6978
Ashton, et al. v. Al Qaeda Islamic Army, et al., Case No. 02 Civ. 6977
Estate of O'Neill v. Al Baraka Investment & Development Corp., 04-CV-1923
Euro Brokers Inc., et al., v. Al Baraka, et al., No. 04 Civ. 7279
Continental Casualty Co., et al. v. Al Qaeda, et al., No. 04 Civ. 5970
Cantor Fitzgerald Associates, LP v. Akida Investment Co., Ltd., 04-CV-7065

DECLARATION OF ROBERT T. HAEFELE IN SUPPORT OF PLAINTIFFS' MOTION FOR SANCTIONS AS TO CHARITY OFFICIAL DEFENDANTS ABDULLAH OMAR NASEEF, ABDULLAH BIN SALEH AL OBAID, ABDULLAH MAHSEN AL TURKI, ADNAN BASHA, AND SOLIMAN AL-BUTHE

I, Robert T. Haefele, Esq., affirm, under penalty of perjury, as follows:

1. I am an attorney admitted to practice before this Court, a member of the Plaintiffs' Executive Committees in this MDL, and associated with the law firm Motley Rice LLC, counsel for Plaintiffs in this MDL. I submit this Declaration to transmit to the Court the following documents submitted in support of Plaintiffs' Motion for Sanctions as to Charity Official Defendants Abdullah Omar Naseef, Abdullah bin Saleh al Obaid, Abdullah Mahsen al Turki, Adnan Basha, and Soliman al-Buthe.

2. Attached hereto are true and correct copies of the Exhibits A – N as indicated below.

- a. Exhibit A is a copy of excerpts from the transcript of proceedings in this MDL on Mar. 22, 2016, including pages 67-68, 71-72, 77, 84-85, 87-88, and 113;
- b. Exhibit B is a copy of excerpts from the transcript of proceedings in this MDL on Sept. 7, 2017 including pages 10-13;
- c. Exhibit C is Plaintiffs' document requests served on defendant Al-Buthe, Request Nos. 17, 19, 48, 59, 60, 64;
- d. Exhibit D is Plaintiffs' document requests served on defendant Naseef, Request Nos. 20, 89, 90, and 98;
- e. Exhibit E is Plaintiffs' document requests served on defendant Al-Obaid, Requests Nos. 24, 96, 97, and 105;
- f. Exhibit F is Plaintiffs' document requests served on defendant Al-Turki, Requests Nos. 27, 103, 104, and 112;
- g. Exhibit G is Plaintiffs' document requests served on defendant Basha, Requests Nos. 20, 93, 94, and 102;
- h. Exhibit H is an Aug. 31, 2017 Letter of Robert T. Haefele, ECF No. 3713, summarizing the discovery requests served on Mr. Al-Buthe into nine categories;
- i. Exhibit I is a June 2, 2017 letter from Alan Kabat with enclosed indices from Al-Turki, Al-Obaid, Naseef and Basha (the indices are not included in the exhibit);
- j. Exhibit J is a June 14 2017 Letter from Alan Kabat regarding Al-Buthe production;
- k. Exhibit K is a Sept. 26, 2017 Letter from Alan Kabat with "Certification of Soliman H. Al-Buthe," dated September 26, 2017;
- l. Exhibit L is a Oct. 5, 2017 Letter from Alan Kabat regarding Naseef, Al-Turki, and Al-Obaid, with "Certification of Dr. Abdullah Bin Saleh Al-Obaid," dated October 4, 2017;

- m. Exhibit M is a Sept. 26, 2017 Letter from Alan Kabat regarding Basha, with “Certification of Dr. Adnan Basha,” dated September 19, 2017; and
- n. Exhibit N is an October 2, 2017 Letter from Kabat, regarding Basha, with “Declaration of Dr. Adnan Basha,” dated September 30, 2017.

Affirmed in Mount Pleasant, South Carolina, on October 6, 2017.

/s/ Robert T. Haefele
Robert T. Haefele, Esquire